

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA

3 IN RE: SOCIAL MEDIA ADOLESCENT  
4 ADDICTION/PERSONAL INJURY  
5 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR

6 THIS MOTION RELATES TO:

Honorable Yvonne Gonzalez Rogers

7 ALL ACTIONS

**STIPULATION AND ~~[PROPOSED]~~  
ORDER GOVERNING SEALING  
PROCEDURES**

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10 Plaintiffs and Meta Platforms, Inc. (“Meta”), Facebook Holdings, LLC, Facebook Operations,  
11 LLC, Facebook Payments, Inc., Facebook Technologies, LLC, Instagram, LLC, Siculus, Inc., and  
12 Mark Elliot Zuckerberg; and TikTok Inc. (“TikTok”), ByteDance Inc., YouTube, Inc. (“Youtube”),  
13 Google LLC, and Alphabet Inc. (“Defendants,” each a “Party,” and together with Plaintiffs the  
14 “Parties”) hereby submit the following Stipulation and [Proposed] Order Governing Sealing  
15 Procedures for the Master Complaint.

16 WHEREAS, this Court instructed the Parties in Case Management Order No. 3 (Dkt. No. 111)  
17 to “confer as to a process that will govern [sealing] in this case and propose a recommendation for the  
18 Court’s consideration” (*id.* at 6);

19 WHEREAS, the Parties continue to confer regarding the process that will govern sealing in this  
20 case;

21 WHEREAS, the deadline to file the Master Complaint is February 14, 2023 (Dkt. 107);

22 WHEREAS, the Parties anticipate that the Master Complaint will reference or rely on  
23 information that Defendants have designated confidential, including information drawn from the  
24 documents produced by Meta and TikTok pursuant to this Court’s order (Dkt. 125) and documents  
25 produced by YouTube and Snap pursuant to negotiated agreements between Plaintiffs and those  
26 Defendants;

27 WHEREAS, pursuant to Civil Local Rule 79-5(f), Plaintiffs will need to file an Administrative  
28 Motion to Consider Whether Another Party’s Materials Should Be Sealed (an “Administrative

1 Motion”) for the portions of the Master Complaint that reference or rely on materials designated  
2 confidential by Defendants;

3 WHEREAS, pursuant to Civil Local Rule 79-5(f)(3), the deadline for Defendants to file a  
4 statement and/or declarations in support of sealing is February 21, 2023, seven days after the filing of  
5 Plaintiffs’ Administrative Motion;

6 WHEREAS, pursuant to Civil Local Rule 79-5(f)(4), the deadline for Plaintiffs to file a  
7 response to Defendants’ statement(s) in support of sealing is February 27, 2023 (Fed. R. Civ. P. 6);

8 WHEREAS, Defendants will need sufficient time to review, evaluate, and determine which  
9 portions of the Master Complaint should remain under seal;

10 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO THE  
11 COURT’S APPROVAL:

12 1. Plaintiffs will file a redacted version of the Master Complaint on the Court’s public  
13 docket and provisionally file an unredacted version of the Master Complaint under seal.

14 2. The deadline for Defendants to submit a statement and/or declarations in support of  
15 sealing portions of Plaintiffs’ Master Complaint cited in Plaintiffs’ Administrative Motion shall be  
16 extended until February 28, 2023.

17 3. The deadline for Plaintiffs to file a response, if any, shall be extended to March 7,  
18 2023.

19 4. Other than the modifications to filing deadlines set forth herein, all other provisions  
20 of Local Rule 79-5 shall apply.

1 **IT IS SO STIPULATED**, through Counsel of Record.

2  
3 Dated: February 13, 2023

Dated: February 13, 2023

4 By: /s/Previn Warren

5 Previn Warren

By: /s/Rosemarie T. Ring

Rosemarie T. Ring

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*Attorneys for Defendants YouTube, Inc., Google  
LLC, and Alphabet Inc.*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: February 14, 2023

  
\_\_\_\_\_  
THE HONORABLE YVONNE GONZALEZ ROGERS

1 Per Civil Local Rule 5-1(h)(3), I attest that concurrence in the filing of this document has  
2 been obtained from the other signatories to this document.

3  
4 Dated: February 13, 2023

5 By: /s/Rosemarie T. Ring  
6 Rosemarie T. Ring  
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